



BAILEY DUQUETTE P.C.

May 1, 2025

**VIA ECF**

The Honorable Victor Marrero  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: ***SAT Aero Holdings, Inc. v. Aerolinea del Estado Mexicano, S.A. de C.V.***,  
**No. 1:24-cv-02300-VM (S.D.N.Y.); Proposed Briefing Schedule**

Dear Judge Marrero:

We represent Plaintiff SAT Aero Holdings, Inc. (“Plaintiff”) in the above-captioned matter. We write on behalf of Plaintiff and Defendant Aerolinea del Estado Mexicano, S.A. de C.V. (“Defendant”) in response to Your Honor’s April 24, 2025, Order [Dkt. No. 21] (“Order”).

Defendant consents to the Court deeming the pre-motion letters to constitute a fully briefed motion to dismiss two of Defendant’s counterclaims and rule on the basis of those letters. Plaintiff does not consent and requests full briefing of its proposed motion to dismiss two of Defendant’s counterclaims. Counsel for Plaintiff and Defendant conferred and agreed upon the briefing schedule listed here.

Plaintiff’s moving brief: **May 22, 2025.**

Defendant’s opposition brief: **June 12, 2025.**

Plaintiff’s reply brief: **June 20, 2025.**

Separately, pursuant to the Court’s Individual Practices II.B.2.-4, as there was no preliminary conference following the parties’ exchange of pre-motion letters, the Court did not issue preliminary guidance about the likely merits of Plaintiff’s anticipated motion to dismiss two of Defendant’s counterclaims. Counsel for Plaintiff plans to file its motion pursuant to the schedule listed above, assuming that the Court so-orders the schedule. Counsel for Defendant respectfully inquires whether Your Honor intends to issue preliminary guidance prior to Plaintiff proceeding with the motion.

Counsel for Plaintiff and Defendant respectfully request that the Court so-order the above briefing schedule with respect to Plaintiff’s anticipated motion to dismiss.



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Respectfully submitted,

/s/ James D. Bailey

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cc: All counsel of record